

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF KENTUCKY  
CENTRAL DIVISION AT LEXINGTON

Garey E. Lindsay, Regional Director of  
the Ninth Region of the National Labor  
Relations Board, for and on behalf of  
the National Labor Relations Board

Petitioner,

vs.

Leggett & Platt, Inc.,

Respondent.

Civil Action No. 5:17-198-KKC

Judge Karen K. Caldwell

**DECLARATION OF GLEN DIXON**

I, Glen Dixon, hereby depose and stated as follows:

1. I am making this declaration voluntarily. I understand that my position at Leggett & Platt, Inc. ("Company") is in no way affected by me making this declaration. I have not been promised anything of benefit by Company for making this declaration, and I have not been threatened by Company in any way in connection with this declaration. I was assured by Company that I was free to give this declaration or not, without promise of benefit, threat of reprisal or any other impact on my employment. I understand that this declaration concerns the circumstances surrounding the signing of a pro-union petition, and may be introduced into evidence in a case between the Company and the NLRB.

2. I work at the Company's Winchester plant (plant #002), and have been represented by the International Association of Machinists Union, Local 619 ("Union").

3. On December 6, 2016, I signed a petition stating, "The undersigned employees of Leggett and Platt #002 do not want to be represented by IAM 619 hereafter referred to as 'union.'" A true and correct copy of the petition I signed on December 6, 2016 is attached as Exhibit A.

4. On January 18, <sup>2017 Glen Dix</sup>~~2016~~, I attended a meeting called by the Union at the Union hall. At that meeting, I was told that the Company and the Union were going to be negotiating. I was also told that if I wanted to receive pay if there was a strike, I should sign a piece of paper that was handed to me. The paper I was handed contained a list of names and signatures. It did not contain any statement at the top of



the page. It did not say, "We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc."

5. This meeting was very fast. I was only there for 10 or 15 minutes waiting in line. There were others waiting in line as well. I heard other people waiting in line being told the same thing I was told—they needed to sign the paper to get strike pay.

6. Attached as Exhibit B is a piece of paper that appears to bear my signature at line 19. I did not sign this document. The document that I signed did not have the writing at the top.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in the county of 22, State of Kentucky, on this 22 day of May 2017.

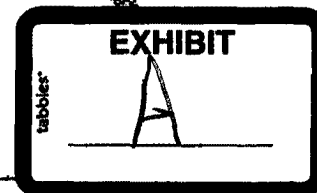
Glen Dixon  
Glen Dixon

(3)

# EMPLOYEE PETITION FOR UNION DECERTIFICATION

The undersigned employees of Leggett and Platt #002 do not want to be represented by IAM 619 hereafter referred to as "union"

Name	signature	clock number	date
1. Keith Lewis	Keith Lewis	7557	12-5-16
2. Mike Kennon	Mike Kennon	3268	12-5-16
3. STEVE PEARAY	Steve Pearay	8863	12-5-16
4. Joseph Jones	Joseph Jones		12-5-16
5. Cody Spencer	Cody Spencer	2014	12-5-16
6. Cody Eugene	Cody Eugene	7132	12-5-16
7. Josh Hanner	Josh Hanner	0727	12-5-16
8. Charles Stone	Charles Stone	0159	12-5-16
9. John Shepherd	John Shepherd	2066	12-5-16
10. Wayne Neal	Wayne Neal	7723	12-5-16
11. Tim Keeton	Tim Keeton	7780	12/5/16
12. Steven McManey	Steven McManey	0201	12-5-16
13. Talmadge Allen	Talmadge Allen	0698	12-5-16
14. Jerry Hanner	Jerry Hanner	0777	12-5-16
15. Jesse Shepherd	Jesse Shepherd	0612	12-5-16
16. Jeffrey Jordan	Jeffrey Jordan	7708	12-5-16
17. Johnny Hanner	Johnny Hanner	0617	12-5-16
18. Lorretta Allen	Lorretta Allen	2160	12-5-16
19. Brian Palmer	Brian Palmer	7957	12/6/16
20. Liz Dixon	Liz Dixon	7440	12/6/2016
21. Zachary Tate	Zachary Tate	0881	12/6/2016
22. Marvin Raper	Marvin Raper	2134	12/16/16
23. Russell Padgett	Russell Padgett	2134	12-5-16



We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc.

<u>Print Name</u>	<u>Sign Name</u>	<u>Date</u>
1. Perry Kirby	Perry Kirby	1-18-17
2. Marvin Berry	Marvin Berry	1-18-17
3. Jess - Dan W.S.	Jess - Dan W.S.	1-18-17
4. Brian Patra	Brian Patra	1-18-17
5. Jose A. Perin	José A. Perin	1-18-17
6. Cecil Gross	Cecil Gross	1-18-17
7. Henry Holloway	Henry Holloway	1-18-17
8. Michael Robinson	Michael Robinson	1-18-17
9. Wilfred Havens	Wilfred Havens	1-18-17
10. Jack Keith	Jack Keith	1-18-17
11. Timothy J. Brunet	Timothy J. Brunet	1-18-17
12. Reed Combs, Jr.	Reed Combs, Jr.	1-18-17
13. CARL STEWARD	Carl Steward	1-18-17
14. THOMAS THORPE	Thomas Thorpe	1-18-17
15. Stephen Hallen	Stephen Hallen	1-18-17
16. Stephen Lotus Sr.	Stephen Lotus Sr.	1-18-17
17. Brandy Stone	Brandy Stone	1-18-17
18. JAMES H. Fugate	James H. Fugate	1-18-17
19. Glen Dixon	Glen Dixon	1-18-17
20. Michael Scott Beaman	Michael Scott Beaman	1-18-17

